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February 28, 2023

VIA ECF

Hon. Jennifer H. Rearden
United States District Court for the
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: ***Ridinger, et al. v. Ralph K. Stone, Rachel L. Gould and Meister
Seelig & Fein LLP***
Docket No.: 22-cv-09082-JHR

Dear Judge Rearden:

We write in response to the letter from plaintiff's counsel, filed on the docket today. [Dkt. No. 40]. We disagree with plaintiff's request for this Court to adopt the Individual Rules of Judge Marrero regarding his pre-motion letter exchange protocol, and oppose plaintiff's request for a pre-motion conference. The circumstances herein do not justify any deviation from Your Honor's Individual Rules.

Since we received notice of the reassignment of this matter to Your Honor, we have unsuccessfully attempted to solicit input from plaintiff's counsel regarding a briefing schedule with respect to our motion to dismiss the amended complaint herein. Plaintiff's letter to the Court today seeks 28 days to oppose our motion, and we have no opposition to such request. We request 14 days after such date to file our reply thereto.

Respectfully submitted,
Lisa L. Shrewsberry
Lisa L. Shrewsberry

cc: All parties of record (via ECF)